

From: Beeler, Cindy

Sent: Friday, February 16, 2018 05:19 PM

To: Vyas, Himanshu; Sorrell, Virginia; Topinka, Natalie; Kaleri, Cynthia; Lawrence, Rob; Mia, Marcia

Subject: RE: Seeking NSPS 0000a compliance data

Ex. 5 Deliberative Process (DP)

Cindy Beeler

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From: Vyas, Himanshu

Sent: Friday, February 16, 2018 9:26 AM

To: Sorrell, Virginia <Sorrell.Virginia@epa.gov>; Beeler, Cindy <Beeler.Cindy@epa.gov>; Topinka, Natalie <topinka.natalie@epa.gov>; Kaleri, Cynthia <kaleri.cynthia@epa.gov>; Lawrence, Rob <Lawrence.Rob@epa.gov>; Mia, Marcia <Mia.Marcia@epa.gov>

Subject: FW: Seeking NSPS 0000a compliance data

Some data from West Virginia, just on one operator (SWN-Southwestern):

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Himanshu Vyas

Environmental Engineer

U.S. EPA, Region III

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From: Jarrett, James F [mailto:James.F.Jarrett@wv.gov]

Sent: Friday, February 16, 2018 10:49 AM

To: Vyas, Himanshu <vyas.himanshu@epa.gov>

Cc: Robertson, James <James.Robertson@wv.gov>; McCumbers, Carrie <Carrie.McCumbers@wv.gov>; Chakrabarty, Renu M <Renu.M.Chakrabarty@wv.gov>

Subject: RE: Seeking NSPS 0000a compliance data

Himanshu,

Below is some of the information you requested. If you'd like to discuss or if you need further information let me know.

Reporting Year

2016

Total # of horizontally fractured oil/gas wells in WV:

2,676

% of wells with oil production <15 bbl/day:

88%

% of wells with condensate production <15 bbl/day:

97%

% of wells with produced water <15 bbl/day:

74%

% of wells with no oil/gas production

12%

I assumed the wells on average operate 90% of the time. If you combine the oil and condensate production, the percentage of wells producing less than 15 bbl/day is 85.

SWN operates the top eleven oil producing wells in WV. Those wells combined to produce over 31 million gallons of oil in 2016. Below is a summary of the DAQ permitted well sites in WV for SWN. SWN's 2017 OOOOa report listed 23 out of 93 well sites subject to the fugitive emission monitoring under NSPS OOOOa. SWN claimed tank VOC emissions are reduced <6 TPY by claiming an air pollution control device thus avoiding NSPS OOOO and OOOOa. West Virginia's general permit (G70) incorporates closed vent requirements where OOOO/OOOOa exemption is claimed.

as of February 2018

Total # of permitted SWN Production well sites in WV:

93

% of permitted SWN Production well sites in WV with storage tanks closed vent systems:

98%

Link to WV Oil and Gas 2016 Production Data

<http://dep.wv.gov/oil-and-gas/databaseinfo/Documents/Production%20Data/2016%20West%20Virginia%20Production%20Data%2011-13-2017.zip>

From: Vyas, Himanshu [mailto:vyas.himanshu@epa.gov]

Sent: Thursday, February 15, 2018 12:15 PM

To: McCumbers, Carrie <Carrie.McCumbers@wv.gov>

Cc: Chakrabarty, Renu M <Renu.M.Chakrabarty@wv.gov>

Subject: Seeking NSPS OOOOa compliance data

Hello,

I am on the national rulemaking workgroup that is working ferociously on the NSPS OOOOa rule reconsideration based on the industry groups' petitions filed after the rule was finalized in June 2016. Needless to say, the reworked rule is going to loosen a lot of the requirements, especially the requirements related to fugitive emissions monitoring and control at wellpads-which is most of the rule; a different rulemaking is also reconsidering whether to continue to regulate methane in this source category.

Before I ask for more specific information, I want to ask whether you have industry-generated compliance data as required under the existing NSPS OOOOa, and whether it is easily accessible to you electronically? If not, don't worry about it. We staff in the rule workgroup are trying to use the compliance and production data to show the need to not loosen the requirements. We have some information from western states such as Colorado and North Dakota, but would be good to have something from West Virginia (and

PA) as well. But I don't want it to be a heavy burden for you, especially since this may be a losing battle.

Thanks,

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